



October 30, 2023

Via ECF and E-mail

Hon. Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

MEMO ENDORSED

**Re: *In re Tether and Bitfinex Crypto Asset Litigation, 19-CV-09236 (KPF)* –
Letter Motion to File Redline Exhibit Under Seal**

Dear Judge Failla,

We represent Plaintiffs in the above-referenced action. Pursuant to Rule 9 of this Court's Individual Rules of Practice in Civil Cases, Plaintiffs request permission to file the redline, per the Court's Order dated October 27, 2023 (ECF No. 484), attached as Exhibit A to Plaintiffs' Letter dated October 30, 2023, under seal.

Plaintiffs' proposed Second Amended Consolidated Complaint filed at ECF No. 480-1 (the "SAC") contains information that has been designated as Confidential or Attorneys' Eyes Only by Defendants pursuant to this Court's Protective Order. ECF No. 151, at ¶3. The SAC also contains information concerning the Anonymous Trader, such information is Attorney's Eyes Only subject to the Court's November 22, 2021 Order. ECF No. 195. With respect to information designated Confidential or Attorneys' Eyes Only by Defendants, Plaintiffs take no position as to Defendants' characterization of that information as Confidential or Attorneys' Eyes Only for the limited purposes of this filing.

Hon. Katherine Polk Failla
October 30, 2023

Respectfully submitted,

/s/ Andrew R. Dunlap

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*Interim Lead Counsel and Attorneys for
Plaintiffs and the Proposed Class*

cc: All Counsel of Record (via ECF)

Application GRANTED. The Clerk of Court is directed to maintain docket entry 486 under seal, viewable to the Court and the parties only. The Clerk of Court is further directed to terminate the pending motion at docket number 485.

Dated: October 31, 2023
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE